

JUL 19 1993

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

Preparation for International
Telecommunication Union
World Radiocommunication
Conferences

)
)
)
)

ET Docket No. 93-198

To: The Commission

COMMENTS OF
THE AMERICAN RADIO RELAY LEAGUE, INCORPORATED

The American Radio Relay League, Incorporated (the League), the national association of amateur radio operators in the United States, by counsel and pursuant to §1.415 of the Commission's Rules (47 C.F.R. §1.415), hereby respectfully submits its comments in the captioned proceeding, pursuant to the Notice of Inquiry, FCC No. 93-328, 58 Fed. Reg. 36630, released June 24, 1993 (the Notice). The Notice solicits comments contributing to the United States' preparation for WRC-93 and identification of issues for inclusion on the agendas of WRC-95 and WRC-97 and the U.S. positions thereon. In response to the issues raised in the Notice, the League states as follows:

I. Introduction

1. The League has participated in United States' preparation

There are a number of issues in the Notice of significant interest to the amateur and amateur-satellite services.

II. Wind Profiler Radars

2. The U.S. Ad Hoc Group has met many times over the past year to draft input documents for the international Task Group 8/2. It has proven difficult to reach agreement on candidate bands for wind profiler radars, considering the need for these devices to share spectrum with existing services. That effort became even more complex at the first international meeting of Task Group 8/2 in Boulder, Colorado, April 19-23, 1993. The Ad Hoc Group is currently meeting to prepare for the second international meeting of Task Group 8/2 in Geneva, October 18-22, 1993. While the plan is to complete the work of the Task Group in 1993, successful completion will depend upon developing a consensus on candidate bands acceptable in all three ITU regions, or separately on a region by region basis. Whether this can be accomplished on time remains to be seen.

III. 7 MHz Issues

3. Appendix II of the Notice, which lists Resolutions and Recommendations Related to Future ITU World Radiocommunication Conferences, includes among those Resolution No. 641 (Rev. HFBC-87), concerning Use of the Frequency Band 7000-7100 kHz. The

action at a WRC competent to address Recommendation 718 (WARC-92), as discussed below.

4. Recommendation 718 (WARC-92), concerning "Alignment of Allocations in the 7 MHz Band Allocated to the Amateur Service", recommends:

that a future competent world administrative radio conference should consider the possibility of aligning the allocations to the amateur service around 7 MHz, with due regard to the requirements of other services...

Successful achievement of a worldwide alignment of a 300 kHz wide band for the amateur service at 7 MHz¹ will require some modification to the allocations of the other services above and below the band, particularly the fixed, land mobile and broadcasting services. Although not on the agenda, the discussion of possible alignment that took place at WARC-92 indicated that there was no room to maneuver in early 1992. Some developing countries asserted that fixed and land mobile operations in the vicinity of 7 MHz were essential. Developed countries with extensive HF broadcasting facilities expressed considerable interest in delivery of these services by satellite, but regarded the surrender of HF operation as premature. The League believes

¹ This is the minimum required worldwide exclusive allocation recommended by the International Amateur Radio Union, as more fully discussed in a July, 1990 statement of spectrum requirements of the Amateur and Amateur-Satellite Services, prepared by the IARU Administrative Council. It is also consistent with the "United States Proposals for the 1992 World Administrative Radio Conference for Dealing with Frequency Allocations in Certain Parts of the Spectrum" (Department of State, July, 1991, at 2). The League presented this same issue to the National Telecommunications and Information Administration in response to its present and future

that the migration of fixed, mobile, and broadcasting services from HF to much higher frequencies, so as to permit satellite delivery of those services, will continue, but not sufficiently quickly for those users to be willing to vacate spectrum around 7 MHz until sometime after WRC-97. This issue should be retained as a current item for consideration, however, as it is important to radio amateurs not only in the United States but worldwide. It is the League's recommendation that a possible 7 MHz realignment should be addressed at a conference competent to consider other HF allocations, when sufficient time has passed for it to be permitted to succeed.

IV. International Amateur Radio Permit

5. The League requests that the United States recommend an international amateur radio permit as an item on the WRC-97 agenda. United States citizens who are licensed radio amateurs frequently travel to foreign countries and operate their stations therein. Presently, U.S. amateurs can operate in Canada, possessed of only their U.S. licenses, and Canadians have the same privileges in the United States, possessed of only their Canadian licenses. In many countries other than Canada, however, it is first necessary to obtain an operating permit, well in advance, from the administration in the countries visited. Such operation is normally based on bilateral or multi-lateral agreements to which the U.S. is a signatory. There are a few countries, having no agreement with the U.S., that permit U.S. citizens to operate only

as a courtesy. Some other countries do not permit U.S. licensed amateurs to operate in their jurisdictions. The United States does not permit operation by visiting amateurs from countries that do not have an agreement with the United States, unless those persons take a United States examination.

6. Amateur radio operation in foreign countries by United States amateur licensees could be facilitated by a system analogous to that long ago established for the International Driving Permit (IDP). Uniform rules for the IDP were established at the United Nations Conference on Road and Motor Transport, Convention on Road Traffic, Geneva, September 19, 1949. Annex 9 of the Convention specified the design of the IDP, printing of the document in the language of the issuing state, and the five languages of the United Nations (English, French, Spanish, Russian and Chinese). Under the provisions of Articles 20 and 24 of the Convention, the American Automobile Association and the American Automobile Touring Alliance have been authorized to issue to United States motorists an international driving permit for use in any country or countries which may require it.

7. It is estimated that several thousand Americans with United States amateur radio licenses will travel abroad and wish to operate in one or more foreign countries this year. The League receives more than 100 written or telephonic inquiries per week from amateur radio operators concerning regulatory procedures for obtaining operating authority in foreign countries. This is probably less than half of the number of amateurs who pursue

foreign operating authority. Also, during the past fiscal year, FCC issued 2848 alien reciprocal permits to foreign amateurs to permit them to operate in the United States.² These numbers are increasing each year. Implementation of an international amateur radio permit would eliminate the burdensome paperwork and delays on the part of the individuals; reduce administrations' regulatory burden and cost, and would facilitate international goodwill, long a hallmark of the Amateur Radio Service.

8. The time between now and WRC-97 is needed to develop a proposed draft resolution detailing provisions of an international amateur radio permit and to implement intermediate steps. One step now under legal study by the Department of State is for the United

9. Appendix 3 is a Resolution of the Board of Directors of the American Radio Relay League calling for the creation of an international amateur radio permit.

V. Conclusions

10. The League suggests that among the WRC-97 issues should be a worldwide alignment of at least a 300 kHz wide band for the amateur service at 7 MHz, and an international amateur radio permit. If the 7 MHz alignment issue is not ripe for consideration at WRC-97, the issue should be held over to a later WRC when the matter can be resolved completely. The Wind Profiler Radar issue should be scheduled for WRC-95.

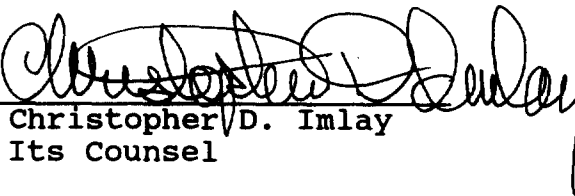
Therefore, the foregoing considered, the American Radio Relay League respectfully requests that the Commission consider the foregoing in structuring proposed agendas and issues for the 1993 WRC.

Respectfully submitted,

**THE AMERICAN RADIO RELAY
LEAGUE, INCORPORATED**

225 Main Street
Newington, CT 06111

By


Christopher D. Imlay
Its Counsel

BOOTH, FRERET & IMLAY
1233 20th Street, N. W.
Suite 204
Washington, D. C. 20036
(202) 296-9100

July 19, 1993

APPENDIX 1



T/R 61-01 E
Page 1

Recommendation T/R 61-01 (Nice 1985, revised in Paris 1992 and by correspondence August 1992)

CEPT RADIO AMATEUR LICENCE

Recommendation proposed by Working Group T/WG 19 "Radio Regulatory" (RR)

Text of the Recommendation adopted by "European Radiocommunications Committee" (ERC).

Appendix I
GENERAL CONDITIONS
FOR THE ISSUE OF "CEPT RADIO AMATEUR LICENCES"

1. GENERAL PROVISIONS RELATING TO THE "CEPT RADIO AMATEUR LICENCE"

The "CEPT radio amateur licence" will take a form similar to a national licence or a special document issued by the same authority, and will be drafted in the national language and in German, English and French; it will be valid for non-residents only, for the duration of their temporary stays in countries having adopted the Recommendation, and within the limit of validity of the national licence. Radio amateurs holding a temporary licence issued in a foreign country may not benefit from the provisions of the Recommendation.

The minimum requirements for a "CEPT radio amateur licence" will be:

- i) a declaration according to which the holder is authorized to utilize his amateur radio station in accordance with this Recommendation in countries where the latter applies;
- ii) the name and address of the holder;
- iii) the call sign;
- iv) the CEPT licence class;
- v) the validity;
- vi) the issuing authority.

A list may be added or provided indicating the Administrations applying the Recommendation.

2. LICENCE CLASSES

Each of the CEPT classes described below will only be considered as equivalent to a national class in cases where conditions of utilization in another country are not considerably broader than those in the country where the licence was issued. The equivalence of national licence classes from CEPT countries to the CEPT licence classes is given in columns 4 and 5 of Appendix II. CEPT licence class holders are authorized to utilize amateur radio in visited CEPT countries according to the national licence class conditions of those visited CEPT countries as shown in columns 6 and 7 of Appendix II.

Class 1

This class permits utilization of all frequency bands allocated to the Amateur Service and Amateur Satellite Service and authorized in the country where the amateur station is to be operated. It will be open only to those amateurs who have proved their competence with Morse code to their own Administration.

Class 2

This class permits utilization of all frequency bands allocated to the Amateur Service and Amateur Satellite Service above 30 MHz and authorized in the country where the amateur station is to be operated.

3. CONDITIONS OF UTILIZATION

- 3.1. On request the licence holder shall present his CEPT radio amateur licence to the appropriate authorities in the country visited.
- 3.2. Authorization is granted for utilization of a portable or mobile station only. A portable station shall, for the purposes of this Recommendation, include any station using mains electricity at a temporary location, e.g. a hotel or a camping site.
- 3.3. Authorization is also granted for utilization of the station of a radio amateur holding a permanent licence in the host country.
- 3.4. The licence holder shall observe the provisions of the ITU Radio Regulations, this Recommendation and the regulations in force in the country visited. Furthermore, any restrictions concerning national and local conditions of a technical nature or regarding the public authorities must be respected. Special attention should be paid to the difference in frequency allocations to the radio amateur services in the three ITU Regions.

Appendix II

**TABLE OF EQUIVALENCE BETWEEN NATIONAL LICENCE CLASSES OF
CEPT COUNTRIES AND CEPT LICENCE CLASSES (columns 4 and 5) AND
TABLE OF EQUIVALENCE BETWEEN CEPT LICENCE CLASSES AND
NATIONAL CLASSES OF CEPT COUNTRIES (columns 6 and 7)**

Note. These tables reflect the situation at 1 August 1991. An up-to-date table is available at the CEPT Liaison Office.
Countries wishing to modify their entries should send a letter to that effect to the chairman of the ERC with a copy to the ERO and the CEPT Liaison Office.

No. *	CEPT member countries	CEPT call sign prefix(es)		National licence classes equivalent to CEPT licence classes			Holders of CEPT classes authorized to transmit in accordance with national classes in respective CEPT countries	
		CEPT classes		CEPT class 1			CEPT class 1	
		1	2				CEPT class 1	CEPT class 2
1	Albania	OE	OE	A ¹⁾	B ¹⁾	C ¹⁾	A ¹⁾	A ²⁾
3	Austria	ON	ON	C	B		C	B
4	Belgium	LZ	LZ	A ¹⁾	B ¹⁾	A ²⁾	B ¹⁾	B ²⁾
5	Bulgaria	SB	SB	-	-	-	-	-
6	Cyprus	OK	OK	A	B	C	B	D
29	Czech and Slovak (Federative Republic)	OZ	OZ	A	B	C	B	D
7	Denmark	OY	OY	A	A	D	A	D
	Faroe Islands	OX	OX	A	D	E	A	D
	Greenland	OH	OH	Y	P	T	Y	T
9	Finland	F	F	D	E	B	B	C
10	France	TK	TK	D	E	B	B	C
	Corse	FO	FO	D	E	B	E	C
	Guadeloupe	FY	FY	D	E	B	E	C
	Guiana	FM	FM	D	E	B	E	C
	Martinique	FJ	FJ	D	E	B	E	C
	St-Bartholomew	FP	FP	D	E	B	E	C
	St-Pierre/Miquelon	FS	FS	D	E	B	E	C
	St-Martin	FR	FR	D	E	B	E	C
	Réunion/Dependencies	DL	DC	B	A	C	B	C
2	Germany	SV	SV	A	B	C	A	B
11	Greece	HA	HG	RHB	RHC	URHB	RHC	URHC
12	Hungary	TF	TF	A	B	C	A	B
14	Iceland	EL	EL	A	B		A	B
13	Ireland	I	I	General	Limited		General	Limited
15	Italy	HBO	HBO	1	2	3	1	3
16	Liechtenstein	LX	LX	General	-		General	-
17	Luxembourg	9H	9H	A	B		A	B
18	Malta	3A	3A	General	Limited		General	Limited
19	Monaco	PA	PA	A	B	C	A	C
21	Netherlands	LA	LA	A	-		A	-
20	Norway	SP ²⁾	SP ²⁾	A ¹⁾	B ¹⁾	C ¹⁾	A	D
22	Poland	CT	CT	A ¹⁾	B ¹⁾	C ¹⁾	A	D
23	Portugal	CU	CU	A ¹⁾	B ¹⁾	C ¹⁾	A	D
	Azores			A ¹⁾	B ¹⁾	C ¹⁾	A	D

Appendix III

PARTICIPATION OF NON-CEPT ADMINISTRATIONS IN THE "CEPT RADIO AMATEUR LICENCE" ACCORDING TO THIS RECOMMENDATION

1. APPLICATION

- 1.1. Administrations, not being members of CEPT, may apply to the CEPT for participation in the CEPT radio amateur licensing systems regulated by this Recommendation. Applications should be addressed to CEPT European Radiocommunications Committee (ERC), through the European Radiocommunications Office (ERO) (see Note).
A non-CEPT Administration in joining this Recommendation enters into an agreement with all CEPT countries having implemented this Recommendation or will do so in the future. It should be noted that non-CEPT countries wishing to implement this Recommendation between them should do so by separate agreement.
- 1.2. The application shall include a list of licence classes in the country concerned, their privileges and the proposed CEPT licence class equivalents. Details of national examination syllabuses or documents describing the requirements of the national licence classes and their privileges shall be enclosed with the application. All the details mentioned above must be submitted in one of the official languages of the CEPT (English, French or German).
- 1.3. The applying Administration shall provide the call sign prefix(es) to be used by visiting radio amateurs, and details of any special conditions relating to the implementation of this Recommendation in the country concerned. Special conditions or restrictions should be confined to a minimum, and should not be imposed unless absolutely necessary.
- 1.4. A non-CEPT Administration having been granted special conditions as per 1.3. shall include these in a footnote in Appendix IV.

2. PROCEDURES OF APPLICATIONS

- 2.1. The CEPT ERC shall check, based mainly on Recommendation T/R 61-02 E, each application to determine the equivalence of the national licence classes to those specified in this Recommendation and to assess the acceptability of any deviations from the respective Recommendations which have been requested by the applying Administration.
- 2.2. When the ERC has agreed to accept the participation of a non-CEPT country it notifies the applying Administration and arranges for the CEPT Liaison Office to include the relevant details in Appendix IV.
- 2.3. A CEPT Administration requiring a separate bilateral agreement to apply this Recommendation with a non-CEPT Administration, shall indicate this in a footnote in Appendix II.
- 2.4. A non-CEPT Administration requiring a separate bilateral agreement to apply this Recommendation with a CEPT Administration, shall indicate this in a footnote in Appendix IV.

3. CONDITIONS OF UTILIZATION

The technical and operational privileges which apply for CEPT-licence holders from non-CEPT countries are in conformity with the privileges of the appropriate national licence classes indicated in Appendix II, columns 6 and 7.

APPENDIX 2

RESOLUTION PTC.III/RES.6 (II-93)

COMMON LICENSES FOR AMATEUR RADIO OPERATORS IN CITEL MEMBER COUNTRIES

The Second Meeting of Permanent Technical Committee III:
Radiocommunications,

CONSIDERING:

That the Lima Agreement (1987) has been signed by only 15
member countries of CITEL,

That amateur radio operators must obtain licenses before
operating in other countries;

That processing of temporary licenses for visiting radio
amateurs is an unnecessary administrative burden for
administrations, and

That common licenses do exist among certain countries in
Region 1.

RESOLVES:

1. To urge the member countries of CITEL to sign the Lima
Agreement (1987), and to develop the concept of common licenses for
regional use.

2. To invite IARU to provide information to the chairman of
PTC.III.

APPENDIX 3

RESOLUTION

WHEREAS, Amateur Radio is a global activity generating international friendship and goodwill, and

WHEREAS, radio amateurs travel widely throughout the world, and

WHEREAS, modern Amateur Radio equipment is highly portable and may be carried by amateurs visiting foreign countries, and

WHEREAS, agreements permitting visiting amateurs to operate exist only between and among certain countries, and

WHEREAS, most countries permitting visiting amateurs to operate under such agreements require that licenses be obtained in each visited country, and

WHEREAS, in the field of licensing operators of motor vehicles a worldwide system of permits was created by the UN Conference on Traffic and Road Safety (1949) which facilitates the travel of those operators, and which provides an appropriate regulatory model for an international amateur radio permit; now therefore

BE IT RESOLVED that the Board of Directors of the American Radio Relay League endorses the concept of an international amateur radio permit and urges that the foundation be laid for the submission of a proposal to create such a permit to a future International Telecommunication Union conference.